

Application No.: 09/829227

Docket No.: SMQ-063/PS742

**REMARKS**

Claims 1-23 are pending in the application of which claims 1, 9, 15 and 20 are independent.

**Claim Rejections Pursuant to 35 U.S.C. §103(a)**

Claims 1, 3-9, 11-15, 17-20, 22 and 23 were rejected by the Examiner pursuant to 35 U.S.C. §103(a) as being unpatentable over John E. Pavlov (United States Patent No.: 6, 725, 426, hereafter "Pavlov") in view of Hyman et al (United States Patent No.: 6, 772, 395, hereafter "Hyman"). For the reasons set forth below, those rejections are respectfully traversed.

**Summary of Claimed Invention**

The claimed invention provides a method for receiving data from a remote location, such as periodic reports from members of a business organization, in a central location. The method provides for the automatic conversion of data into an Extensible Markup Language (XML) document, the storage of the XML document, and the emailing of the data in the converted document to a designated recipient. The converted document is stored in a central location where it can be accessed by a designated user who is connected to the network. The method provides a mechanism for the designated user to manipulate the data in the converted document so that it may be displayed in a number of different ways.

**Summary of Claim Amendments**

Applicants have amended the independent claims, claims 1, 9, 15, 20, to clarify that the first document is received from a first user at a remote location and has also corrected a typographical error.

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Summary of Pavlov

Pavlov discusses a mechanism for converting word processing documents into XML documents. The mechanism for converting between word processing documents and XML documents is integrated into a word processing program so that when a user creates a word processing document, the word processing document may be converted into an XML document and persistently stored. The content is available as an XML document for display by a web browser.

Summary of Hyman

Hyman discusses a self-modifying flow execution architecture for computer-readable structures, such as markup language, that is modeled as a network of interconnected processing elements that each have a data input and a transformation input. The processing elements generate output by applying the transformation input to the data input. The resulting interconnected processing elements are modified dynamically based upon the data flowing through the overall process.

Argument

The combination of references, Pavlov in view of Hyman, fails to teach or suggest all of the elements of Applicants' independent claims. Applicants' independent claims as amended all include the element of receiving a first document from a remote location. The received document is then automatically converted into XML and stored. The combination of references cited by the Examiner fails to disclose these elements.

The Examiner cited column 1, lines 12-38 of Pavlov as disclosing the receipt of a first document by a first user. The cited section does not teach or suggest the amended claim limitation that a document received from a remote location is automatically converted to XML and then stored. Rather, the cited section discusses providing access to documents over the Internet or via an intranet (see col. 1, lines 22) and the general desire to store documents

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in an XML format(see col. 1, lines 35-36). Pavlov does not discuss the receiving of a document from a remote location that is automatically converted upon receipt into XML and then stored as required by Applicants' amended claims.

The Examiner cited Hyman at col. 6, lines 45-50 as teaching permitting access to an XML document from a remote location by a second user. Hyman however, while discussing the retrieval of web pages from a server, does not teach or suggest the limitation missing from Pavlov of receiving a document from a remote location that is automatically converted upon receipt into XML and then stored as required by Applicants' amended claims.

Accordingly, since the combination of Pavlov in view of Hyman fails to teach or suggest all of the elements of the independent claims, Applicants request the withdrawal of the rejections directed to claims 1, 3-9, 11-15, 17-20, 22 and 23 and their allowance.

Claims 2, 10, 16 and 21 were rejected by the Examiner pursuant to 35 U.S.C. §103(a) as being unpatentable over Pavlov in view of Hyman in further view of Erez Halahmi (United States Patent No.: 6, 684, 088, hereafter "Halahmi"). For the reasons set forth below, those rejections are respectfully traversed.

#### Summary of Halahmi

Halahmi discusses a system and method for transmitting email messages to a low bandwidth device and the displaying of the contents of the messages by the device. An exemplary device is a wireless communication device. The system works with multiple email protocols. The email messages are divided into portions based upon a determined property of the low bandwidth device.

Applicants' claims 2, 10, 16 and 21 all include the additional step of automatically e-mailing the data contained within the XML document to a recipient, the recipient being indicated by the first user when submitting the first document. The Examiner, while admitting that Pavlov and Hyman lacked the limitation, suggested that the limitation was taught by Halahmi. Applicants respectfully disagree.

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The Examiner cites col. 6, lines 10-18 of Halahmi as teaching the missing limitation of automatically e-mailing the data contained within the XML document to a recipient, the recipient being indicated by the first user when submitting the first document. The cited section of Halahmi discusses sending the received message to a conversion module where the file format of the received message is converted into a standard file format (see col. 6, lines 10-18). The section does not discuss the indication of an email recipient by the first user when submitting the first document. Accordingly, since the combination of Pavlov in view of Hyman in further view of Halahmi fails to teach or suggest all of the elements of claims 2, 10, 16 and 21, Applicants request the withdrawal of the rejections directed to the claims and their allowance. Applicants further note as an additional reason for the allowance of claims 2, 10, 16 and 21 that the underlying independent claims are in condition for allowance as set forth above, and Halahmi also does not include the missing limitations of the independent claims.

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**CONCLUSION**

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-063 from which the undersigned is authorized to draw.

Dated: December 9, 2004

Respectfully submitted,

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